



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor

August 15, 2006

Mr. Marshall Cloud
Defense Logistics Agency
Defense Distribution Depot San Joaquin, Sharpe Site
Post Office Box 960001
Stockton, California 95296-0250

CONCURRENCE ON THE DRAFT REMEDIAL ACTION WORK PLAN SITE S-26
AREA SIX, DATED AUGUST 4, 2006, FOR DEFENSE DISTRIBUTION DEPOT
SAN JOAQUIN COUNTY (DDJC), SHARPE SITE, LATHROP, CALIFORNIA

Dear Mr. Cloud:

The Department of Toxic Substances Control (DTSC) received the above-mentioned work plan on August 7, 2006. The Site S-26 Area 6 Work Plan presents the design analysis, field procedures, and quality control procedures to be followed during the planned action in fall 2006 to remove lead and chromium-contaminated soil at Site S-26.

Site History

In 1996, Site S-26 characterization efforts by Radian International sampled soil to further define the excavation area and volume of remaining contaminated soil. The 1997 Design Analysis Report by Radian International for Site S-26 estimated that approximately 90 cubic yards of lead contaminated soil remains. During 1998, limited soil removal actions were conducted at Site S-3 and five of the six Areas of Site S-26, but were not performed at Site S-26 Area 6 due to the prohibitive cost of removing and replacing the operational railroad tracks in the area, and also due to DI-WET results for lead and chromium soil samples showing no threat of impact to the ground water.

Record of Decision

DDJC-Sharpe's Operable Unit #2 (OU2) Record of Decision (ROD) remedy for lead and chromium-contaminated soil specified excavation and disposal of soil exceeding the United States Environmental Protection Agency's 2004 Industrial Preliminary Remediation Goal cleanup levels of 800 mg/kg and 300 mg/kg for lead and total chromium, respectively. The OU2 ROD specifies confirmation sampling of the excavation base to ensure soils with lead and chromium concentrations above the cleanup levels have been removed to a minimum depth of two feet below the existing ground surface (bgs).

Sampling and Analysis

Approximately 1,170 square feet of Site 26 Area 6 will be excavated to a depth of approximately two feet bgs. The excavated dirt will be collected in roll-off bins where each bin will be individually characterized for off-site disposal. After two feet of soil is removed, the exposed subsurface will be sampled to determine the vertical extent of any remaining contamination. The samples of the excavation floor will be collected on a grid pattern of approximately 30 by 30 linear feet. Soil samples will be collected via hand auger or Shelby tube method. All samples from the excavation floor will be analyzed for total lead and chromium using Method SW6010B. Analytical results will determine whether additional excavation is needed, according to the Work Plan's Soil Characterization Flow Diagram. If over-excavation is required, an additional one foot of soil will be removed from those cells exceeding the cleanup standards with floor samples being collected and analyzed again. The process will be repeated until the cleanup standards are achieved. The excavation will be restored to pre-existing grade with certified clean fill after confirming that cleanup standards are met for lead and chromium.

Conclusion

DTSC concurs with the Work Plan's determinations and proposed soil removal action. DTSC will be awaiting a mobilization notice from DDJC-Sharpe so it may attend and provide regulatory oversight during the upcoming fieldwork.

Mr. Marshall Cloud
August 15, 2006
Page 3

If you have any questions or comments regarding this letter, please feel free to contact Mr. Peter MacNicholl, of my staff, at (916) 255-3713.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony J. Landis". The signature is fluid and cursive, with the first name "Anthony" and last name "Landis" clearly distinguishable.

Anthony Landis, P.E.
Chief
Northern California Operations
Office of Military Facilities

cc: See DDJC-Sharp Distribution List.

DDJC-Sharpe Distribution List

Mr. Mike Thomas
URS Corporation
Crown Corporate Center
2870 Gateway Oaks Drive, Suite 300
Sacramento, CA 95833

Mr. Rich Howard
TechLaw, Incorporated
921 11th Street, 8th Floor
Sacramento, California 95814

Ms. Xuan-Mai Tran (SFD-8-3)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94195

Ms. Diane Hinson
Environmental Health Department
San Joaquin County
Post Office Box 2009
Stockton, California 95201

Mr. Jarel Starling
U.S. Army Corps of Engineers
ATTN: CEHND-ED-PM
Post Office Box 1600
Huntsville, Alabama 35807-4301

Mr. Jim Brownell
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive # 200
Rancho Cordova, California 95670-6114